

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 WILLIAM A. MUNDELL

Chairman

3 JIM IRVIN

Commissioner

4 MARC SPITZER

Commissioner

5 **In the matter of:**

) Docket No. S-03467A-01-0000

6 **REPUBLIC CASH ADVANCE, INC.**

7 1616 East Main Street, Suite 226

8 Mesa, Arizona 85203

) Decision No. _____ 65035 _____

9 **QUICK CASH ADVANCE, INC.**

10 1616 East Main Street, Suite 226

Mesa, Arizona 85203

) **ORDER TO CEASE AND DESIST**
) **AND ORDER FOR OTHER RELIEF**
) **AS AGAINST RESPONDENTS**
) **REPUBLIC CASH ADVANCE, INC.,**
) **QUICK CASH ADVANCE, INC.,**
) **CURTIS J. BILLUPS AND MARK N.**
) **FERGUSON**

11 **CURTIS J. BILLUPS**

12 51089 West Papago Road

Maricopa, Arizona 85239

13 **MARK N. FERGUSON**

14 15433 North 45th Street

15 Phoenix, Arizona 85032

16 Respondents.

17 **I.**

18 **INTRODUCTION**

19 On August 20, 2001, the Securities Division ("Division") of the Arizona Corporation
20 Commission ("Commission") filed a Temporary Order to Cease and Desist and Notice of
21 Opportunity for Hearing ("TC&D") against REPUBLIC CASH ADVANCE, INC., QUICK CASH
22 ADVANCE, INC., CURTIS J. BILLUPS and MARK N. FERGUSON. On this same date, the
23 TC&D was personally served on REPUBLIC CASH ADVANCE, QUICK CASH ADVANCE and
24 FERGUSON. Shortly thereafter, on August 28, 2001, the Division effected service on BILLUPS,
25 the remaining Respondent in this matter, through the acceptance of service by BILLUPS' Florida
26 attorney, Richard P. Green.

1 The TC&D afforded the Respondents the opportunity to request a hearing with the
2 Commission within 20 days from each of these Respondents' respective dates of service. To date,
3 none of the Respondents have requested a hearing or have otherwise made any formal appearance in
4 this case. As such, Respondents REPUBLIC CASH ADVANCE, QUICK CASH ADVANCE,
5 BILLUPS and FERGUSON have chosen not to contest the Division's allegations in this matter.

6 II.

7 FINDINGS OF FACT

8 1. REPUBLIC CASH ADVANCE, INC. ("REPUBLIC"), whose last known address
9 was 1616 East Main Street, Suite 226, Mesa, Arizona, was a Nevada corporation involved in the
10 solicitation of investment capital for various Florida check cashing stores and other "accounts
11 receivable" operations.

12 2. QUICK CASH ADVANCE, INC. ("QUICK CASH"), whose last known address
13 was 1616 East Main Street, Suite 226, Mesa, Arizona, was a Florida corporation closely affiliated
14 with REPUBLIC, and was also involved in the generation of investment capital to finance various
15 Florida check cashing stores and at least one accounts receivable program.

16 3. CURTIS J. BILLUPS ("BILLUPS"), whose last known address was 51089 West
17 Papago Road, Maricopa, Arizona, was the president, CEO and principal shareholder of both
18 REPUBLIC and QUICK CASH.

19 4. MARK N. FERGUSON ("FERGUSON"), whose last known address was 15433
20 North 45th Street, Phoenix, Arizona, was the project manager of the telemarketing office at the
21 previous REPUBLIC/QUICK CASH headquarters in Tempe, Arizona, and in that capacity oversaw
22 the solicitation activities at those offices.

23 5. REPUBLIC, QUICK CASH, BILLUPS, and FERGUSON may be collectively
24 referred to as "RESPONDENTS."

25 6. RESPONDENTS have been engaging in the offer and sale of investment products
26 within or from Arizona since at least the fall of 1998. During this period, RESPONDENTS have

1 been involved in a series of securities offerings, each of these ostensibly designed to finance either
2 the development of a Florida check-cashing enterprise or to fund the creation of an accounts
3 receivable or “factoring” program.

4 7. During the period from late 1998 through November, 2001, RESPONDENTS raised
5 a minimum of \$6,248,492 in investment funds from at least 420 separate investors throughout the
6 United States. The bulk of this money was expended on sales commissions, salaries, promotional
7 costs and personal items; only a fraction of these funds was used for business purposes as set forth in
8 the various private placement materials provided to investors.

9 8. Each of the offerings alluded to above originated out of greater Phoenix locations;
10 the investment literature for these programs was distributed out of RESPONDENTS’ Phoenix (and
11 later Tempe) main offices, and the investment funds for the various programs were routinely
12 remitted back to bank accounts located in nearby Mesa, Arizona. These accounts were uniformly
13 held in the names of BILLUPS, REPUBLIC and/or QUICK CASH; BILLUPS was the signatory on
14 most if not all of these accounts.

15 9. In total, RESPONDENTS solicited investment funds for at least eight distinct
16 programs. These investment projects included a check-cashing venture with Republic Cash
17 Advance of Tampa, L.L.C. in 1998, a check-cashing venture with Republic Cash Advance of
18 Orlando, L.L.C. in 1999, check-cashing ventures with Quick Cash Advance of Fort Lauderdale,
19 L.L.C. and Quick Cash Advance of Miami, L.L.C. in 2000, and a check-cashing venture with Quick
20 Cash Advance of Dade County, L.L.C. in 2001. Beyond these check-cashing programs,
21 RESPONDENTS also launched two REPUBLIC factoring programs and one QUICK CASH
22 factoring program during 2001.

23 10. RESPONDENTS’ sales tactics were similar in each of the various investment
24 programs. In the Republic Cash Advance of Tampa, L.L.C. private offering, for instance,
25 REPUBLIC sales representatives “cold-called” prospective investors across the country to offer
26 these individuals an opportunity to invest in REPUBLIC’S check-cashing operations in the greater

1 Tampa area.

2 11. After receiving the unsolicited calls, many of the prospective investors subsequently
3 received a private placement memorandum from REPUBLIC, listing BILLUPS as the president,
4 treasurer and director of the company. These investors, many of whom were unaccredited
5 individuals, had insufficient knowledge of financial matters to adequately evaluate the terms of the
6 offering.

7 12. The offering materials claimed that REPUBLIC was planning to establish a franchise
8 of check-cashing stores in the Tampa metro area, and that prospective investors could participate in
9 the project by purchasing a minimum of two membership units at a cost of \$10,000 per unit.

10 13. According to these same materials, REPUBLIC'S securities offering was exempt
11 from federal registration pursuant to a federal 504 filing, notwithstanding the fact no such 504 filing
12 was ever made. Concurrently, the offering materials failed to disclose that REPUBLIC'S securities
13 offering was neither registered nor exempt from registration in the state of Arizona.

14 14. The investment literature also claimed that the investment funds would be primarily
15 used for working capital for the check-cashing stores, when in fact a large segment of the investment
16 funds were ultimately diverted for non-business related purposes.

17 15. On account of the Tampa L.L.C. offering, the Illinois Securities Department issued
18 an Order of Prohibition in 2000, directing Republic Cash Advance of Tampa, L.L.C., REPUBLIC,
19 BILLUPS, and any affiliates or other employees, to cease and desist from their unauthorized selling
20 activities within the state of Illinois.

21 16. The misrepresentations and omissions outlined above were largely mirrored in
22 REPUBLIC'S next project, the Republic Cash Advance of Orlando L.L.C. offering in 1999. In this
23 program, telemarketers once again offered and sold prospective investors membership interests in a
24 REPUBLIC limited liability company purportedly designed to establish a series of check-cashing
25 stores in the greater Orlando area.

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1 17. On account of this and the prior Tampa L.L.C. offering, several additional state
2 agencies, including Pennsylvania and South Dakota, issued Cease and Desist Orders against
3 REPUBLIC, BILLUPS, and several of his affiliates in connection with the fraudulent and/or
4 unauthorized sale of unregistered securities.

5 18. Notwithstanding these Orders, QUICK CASH sales representatives were soon
6 making additional cold calls in 2000 to sell new membership interests in the company Quick Cash
7 Advance of Fort Lauderdale, L.L.C., an enterprise purportedly set up to manage several Fort
8 Lauderdale, Florida check-cashing facilities.

9 19. According to the private placement memorandum associated with this offering,
10 BILLUPS was again the president, director and treasurer of QUICK CASH. QUICK CASH was
11 also designated as the managing member of the Quick Cash of Fort Lauderdale check-cashing
12 operation.

13 20. As with the prior REPUBLIC offerings, the promotion of the Quick Cash of Fort
14 Lauderdale program included a number of misrepresentations, including the claim that the
15 investment funds would primarily be used for working capital purposes set forth in the offering
16 memorandum, and that the securities had an applicable exemption from registration on the federal
17 and state level. In actuality, large amounts of investment funds were being used to pay exorbitant
18 sales commissions to participating telemarketing firms, and neither the Quick Cash of Fort
19 Lauderdale salesmen nor the securities themselves were registered in Arizona.

20 21. Promotional materials for this securities offering also claimed that investors in this
21 check cashing company could expect to generate a return of up to 25 times the original investment
22 when the securities "went public." In fact, the Quick Cash of Fort Lauderdale securities offering
23 had no basis upon which to predict a 25 to 1 return to principal, particularly where the project had
24 failed to generate any demonstrable profits.

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1 22. The Quick Cash of Fort Lauderdale offering memoranda also failed to disclose that
2 BILLUPS and REPUBLIC, the owner and predecessor to QUICK CASH, respectively, had recently
3 been the targets of a number of Cease and Desist orders from several state securities agencies.

4 23. RESPONDENTS continued to offer and sell securities in different but related
5 programs just months later. These offerings included investments in Quick Cash Advance of
6 Miami, L.L.C. and Quick Cash of Dade County, L.L.C., each again based out of Arizona. Both of
7 these offering contained the same misrepresentations and omissions as the earlier L.L.C. offerings,
8 with the similar added omission relating to the outstanding regulatory sanctions.

9 24. By 2001, RESPONDENTS were still selling investments to support the alleged
10 Florida check-cashing operations. In February of 2001, REPUBLIC sales representatives began a
11 telemarketing campaign for the purpose of offering prospective investors the opportunity to invest in
12 a REPUBLIC promissory note issuance. According to the investment literature associated with
13 this note offering, the investment monies raised were purportedly designated for two purposes: to
14 support the ongoing operations of various Florida check-cashing stores and to finance the
15 development of a “factoring” program - a program whereby REPUBLIC would purchase discounted
16 accounts receivable from established businesses and resell them at a profit.

17 25. As represented by the sales agents in this REPUBLIC note program, the private
18 placement of these notes would produce a return to the investor of 5% in 90 days (or approximately
19 22.2% per annum), at which time the investors could purportedly recover their principal or choose to
20 rollover their investments for another investment term.

21 26. Most of the promissory note investment proceeds were in fact diverted for
22 undisclosed expenditures including sales commissions, salaries, marketing costs and personal
23 items. In fact, REPUBLIC’S payment of sales commissions for the solicitation of these
24 investments reached upwards of 35 to 50 percent of the total amount of investment monies
25 generated - despite promotional claims that there would be no sales commissions associated with
26 this offering.

1 27. The investment literature for this promissory note program again claimed that these
2 securities were exempt from registration on the state level and exempt on the federal level pursuant
3 to Rule 504 of Regulation D and/or Section 4(2) of the Securities Act of 1933, when in fact this
4 offering was ineligible for any such exemption.

5 28. By May 2001, RESPONDENTS were selling yet another related investment
6 “opportunity.” This time, a number of out-of state and Tempe salesmen, including FERGUSON,
7 began a telemarketing campaign for the purpose of offering prospective investors the chance to
8 invest in a QUICK CASH promissory note offering. According to the prospectus associated with
9 this alleged private placement, the investment monies raised from this note offering were being
10 solicited to finance the development of a QUICK CASH factoring program, another operation
11 whereby QUICK CASH planned to purchase discounted accounts receivable from established
12 businesses for subsequent resale.

13 29. As represented by the sales agents in this QUICK CASH note program, the alleged
14 private placement of these notes would produce a return to the investor of 20% in 9 months (or an
15 interest rate of approximately 26.67% per annum), at which time the investors could purportedly
16 recover their principal or choose to rollover their investments for an additional term.

17 30. Most of the investment proceeds solicited through the QUICK CASH note
18 offering were again diverted for undisclosed expenditures including sales commissions, salaries,
19 marketing costs and personal items. QUICK CASH’S payment of sales commissions for the
20 solicitation of these promissory note investments ranged anywhere from 7 to 50 percent of the
21 total amount of investment monies generated. FERGUSON encouraged his Tempe sales staff
22 that they could make upwards of \$10,000 to \$14,000 per week in sales commissions for their
23 sales efforts.

24 31. BILLUPS was again listed as the acting president and CEO of QUICK CASH’S note
25 program, and FERGUSON was designated as the Tempe project manager for this offering. As part
26 . . .

1 of his managerial functions, FERGUSON trained telemarketers and assisted less seasoned salesmen
2 in “closing” sales to tentative investors.

3 32. The promissory notes that made up this offering were not registered with the
4 Division, and no notice filings were made with the Division in connection with this security.
5 Similarly, neither FERGUSON and the other salesmen who solicited this offering, nor QUICK
6 CASH, the issuer-dealer of this security, was registered as salesmen or a dealer in the state of
7 Arizona.

8 33. By the fall of 2001, RESPONDENTS were still selling yet another investment to the
9 general public. In August of 2001, REPUBLIC sales representatives began a telemarketing
10 campaign for the purpose of offering prospective investors the opportunity to invest in a second
11 REPUBLIC promissory note issuance. According to the investment literature associated with this
12 offering, the investment monies raised from this note sale would finance yet another REPUBLIC
13 “factoring” program.

14 34. As represented by the sales agents in this second REPUBLIC factoring program, the
15 alleged private placement of these notes would produce a return to the investor of 20% per annum
16 and have a maturity term of 90 days, after which the investors could recover their principal or once
17 again elect to rollover their investments.

18 35. Most of the promissory note investment proceeds were in fact diverted for
19 undisclosed expenditures including sales commissions, salaries, marketing costs and personal
20 items. As before, even though the investment literature specifically stated that there would be no
21 sales commissions associated with this note offering, REPUBLIC’S payment of sales
22 commissions for the solicitation of these investments ranged anywhere from 35 to 50 percent of
23 the total amount of investment monies generated.

24 36. The offering materials for REPUBLIC’S second promissory note “private
25 placement” again originated out of the business offices of REPUBLIC and QUICK CASH in
26 Tempe, Arizona, although the general solicitations associated with these note sales took place as

1 far away as Florida. Notwithstanding the multi-state telemarketing network, the investment
2 funds for this program were subsequently mailed back to Tempe or wired directly into
3 REPUBLIC bank accounts in Mesa, Arizona.

4 37. As with all the previous offerings, the promissory notes that made up this offering
5 were not registered with the Division, and no notice filings were made with the Division in
6 connection with this security. Similarly, neither the salesmen who solicited this offering, nor
7 REPUBLIC, the issuer-dealer of this security, were registered as salesmen or dealers in the state of
8 Arizona.

9 38. As before, the investment literature for this promissory note program once again
10 failed to disclose that both REPUBLIC and BILLUPS had previously received multiple cease and
11 desist orders for securities violations from other jurisdictions.

12 39. On December 21, 2001, BILLUPS sent a letter to the many investors in the various
13 QUICK CASH and REPUBLIC investment programs, including those in the Tampa, Orlando, Fort
14 Lauderdale, Miami, and Dade County L.L.C.s, as well as those in the various promissory note
15 factoring programs. This letter claimed that the companies were closing down as a result of the
16 adverse business affects caused by the September 11, 2001 terrorist attacks, and that the investors
17 would no longer be receiving interest payments on their investments. Also evident from this letter
18 was the fact that the investors would no longer have recourse to recover their principal investments.

19 40. An attorney for BILLUPS subsequently sent a letter to former investors in April,
20 2002, claiming that the companies would be liquidating their assets, and that the investors might
21 recover a portion of their investments upon the completion of this liquidation. The attorney
22 intimated that any complaints or inquiries about the companies' operations and/or liquidation
23 process would jeopardize the process as well as any possible recovery by the investors. As of June
24 2002, the Division is unaware of any implicated investors that have received monies from this
25 purported liquidation.

26 . . .

Summary of Respondents' Securities Offerings

41. During their period of operation, RESPONDENTS raised and/or deposited into personal and company bank accounts a minimum of **\$6,248,492** in investment funds in connection with the sale of securities arising out of at least eight distinct investment programs. The revenues from the sale of these various limited partnership and/or promissory note investments made by RESPONDENTS from their metro Phoenix headquarters can be isolated more specifically as follows:

	<u>Program</u>	<u>Minimum Investment Amount Raised</u>
a)	RCA of Tampa, L.L.C.	\$ 510,000
b)	RCA of Orlando, L.L.C.	\$1,080,000
c)	QCA of Fort Lauderdale, L.L.C.	\$1,055,000
d)	QCA of Miami, L.L.C.	\$ 960,000
e)	RCA, Inc. Factoring Notes I & II	\$1,313,500
f)	QCA, Inc. Factoring Notes	\$1,095,000
g)	QCA of Dade County, L.L.C.	<u>\$ 234,992</u>
	TOTAL:	\$6,248,492

42. To date, none of the above investment programs offered and sold by RESPONDENTS have fulfilled the promised returns to investors.

43. None of the securities referenced above were duly registered under A.R.S. §§ 44-1871 through 44-1875, or 44-1891 through 44-1902; none of the above were exempt under A.R.S. §§ 44-1843 or 44-1843.01; none of the above were offered or sold as exempt transactions under A.R.S. § 44-1844; and none of the above were exempt under any rule or order promulgated by the Commission.

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1 44. In connection with the offers to sell and the sale of securities, RESPONDENTS
2 acted as dealers and/or salesmen within and from Arizona, although not registered pursuant to the
3 provisions of Article 9 of the Securities Act of Arizona.

4 45. In connection with the offers and sales of securities within and from Arizona,
5 RESPONDENTS directly or indirectly: (i) employed a device, scheme or artifice to defraud; (ii)
6 made untrue statements of material fact or omitted to state material facts which were necessary in
7 order to make the statements made not misleading in light of the circumstances under which they
8 were made; and (iii) engaged in transactions, practices or courses of business which operated or
9 would operate as a fraud or deceit upon offerees and investors. RESPONDENTS' conduct includes,
10 but is not limited to, the following actions:

- 11 a) RESPONDENTS misrepresented to investors that the securities being offered were
12 exempt from state and federal securities registration provisions, when in fact the
13 securities were not eligible for such exemptions.
- 14 b) RESPONDENTS failed to disclose to investors that RESPONDENTS were not duly
15 registered as either salesmen or dealers within the state of Arizona.
- 16 c) RESPONDENTS misrepresented to investors that their investment proceeds were to
17 be used primarily as operating capital for check-cashing stores and/or for the
18 purchase of discounted accounts receivable, when in fact the bulk of the investment
19 monies were expended on sales commissions, salaries, marketing expenses and other
20 personal expenditures.
- 21 d) RESPONDENTS misrepresented to investors that their investments would be worth
22 up to 25 times their initial investment amounts once the RESPONDENTS' programs
23 "went public," when in fact RESPONDENTS had no financial or other cognizable
24 basis upon which to make such an assertion.

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1 e) RESPONDENTS failed to disclose to investors that approximately 35 to 50 percent
2 of the solicited investment funds were commonly used for sales commissions and
3 sales overrides.

4 f) RESPONDENTS failed to disclose to investors that both REPUBLIC and QUICK
5 CASH, as well as their president, BILLUPS, had previously received cease and
6 desist orders from a number of other state regulatory agencies.

7 **III.**

8 **CONCLUSIONS OF LAW**

9 1. The Arizona Corporation Commission has jurisdiction over this matter pursuant to
10 Article XV of the Arizona Constitution and pursuant to the Securities Act of Arizona, A.R.S. § 44-
11 1801, *et seq.* (the “Securities Act”).

12 2. REPUBLIC, QUICK CASH, BILLUPS and FERGUSON offered and sold securities
13 within or from Arizona within the definitions of A.R.S. §§ 44-1801(15), 44-1801(21), and 44-
14 1801(26).

15 3. REPUBLIC, QUICK CASH, BILLUPS and FERGUSON violated A.R.S. § 44-1841
16 by offering or selling securities that were neither registered nor exempt from registration.

17 4. REPUBLIC, QUICK CASH, BILLUPS and FERGUSON violated A.R.S. § 44-1842
18 by offering or selling securities while neither registered as dealers or salesmen nor exempt from such
19 registration.

20 5. REPUBLIC, QUICK CASH, BILLUPS and FERGUSON violated A.R.S. § 44-1991
21 by (a) employing a device, scheme or artifice to defraud; (b) making untrue statements or misleading
22 omissions of material facts; and (c) engaging in transactions, practices or courses of business which
23 operate or would operate as a fraud or deceit.

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IV.

ORDER

THEREFORE, on the basis of the Commission's Findings of Fact and Conclusions of Law, the following Order is appropriate, in the public interest, and necessary for the protection of investors:

IT IS ORDERED, pursuant to A.R.S. §§ 44-2032, 44-1972 and A.A.C. R14-4-307, that the RESPONDENTS and their agents, servants, employees, successors, assigns, and those persons in active concert or participation with them CEASE AND DESIST from the following activities:

1) The offer and/or sale of any securities described herein within or from the state of Arizona;

2) The offer and/or sale of any other form of security within or from the state of Arizona, unless such securities are registered with the Commission pursuant to Articles 6 and 7 of the Securities Act of Arizona or are otherwise duly exempt from registration;

3) The offer or sale of any securities within or from the state of Arizona unless the requisite registration as dealers and/or salesmen is first obtained under Article 9 of the Securities Act of Arizona, or unless an exemption from registration is applicable;

4) The offer and/or sale of any securities within or from the state of Arizona through a material misrepresentation or omission, and/or through a course of conduct that would operate as a fraud or deceit on investors; and

5) Any other activity constituting a violation of the Securities Act of Arizona.

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1 IT IS FURTHER ORDERED that, pursuant to A.R.S. § 44-2032, Respondents REPUBLIC,
2 QUICK CASH and BILLUPS shall jointly and severally pay restitution to investors in the amount
3 of \$5,153,492,¹ such restitution made payable to the state of Arizona. This restitution amount is due
4 and payable immediately upon the effective date of this Order, and shall be distributed on a pro rata
5 basis to known investors that have incurred losses from RESPONDENTS' various investment
6 programs cited herein.

7 IT IS FURTHER ORDERED that, pursuant to A.R.S. § 44-2032, Respondents REPUBLIC,
8 QUICK CASH, BILLUPS and FERGUSON shall jointly and severally pay further restitution to
9 investors in the amount of \$1,095,000,² such additional restitution again made payable to the state of
10 Arizona. This restitution amount is also due and payable immediately upon the effective date of
11 this Order, and shall be distributed on a pro rata basis to known investors that have incurred losses
12 from RESPONDENTS' various investment programs cited herein.

13 IT IS FURTHER ORDERED that, pursuant to A.R.S. § 44-2036, RESPONDENTS shall
14 jointly and severally pay an administrative penalty in the amount of \$100,000, payable to the "State
15 Treasurer," immediately upon the effective date of this Order for deposit into the general fund of the
16 state of Arizona. This administrative penalty shall be considered a subordinate debt obligation to the
17 restitution obligations outlined above.

18 IT IS FURTHER ORDERED that the restitution and administrative penalties prescribed
19 above shall accrue interest at the maximum legal rate from the effective date of this Order until
20 paid in full.

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24 ¹ This restitution figure represents the total amount of investor funds solicited through investment
25 programs **a), b), c), d), e) and g)** as identified in paragraph No. 41 above.

26 ² This restitution figure represents the total amount of investor funds solicited through investment
program **f)** as identified in paragraph No. 41 above.

1 IT IS FURTHER ORDERED that this Order shall become effective immediately upon the
2 date set forth below.

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4 **BY ORDER OF THE ARIZONA CORPORATION COMMISSION**

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7 **CHAIRMAN**

COMMISSIONER

COMMISSIONER

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10 IN WITNESS WHEREOF, I, BRIAN C. McNEIL,
11 Executive Secretary of the Arizona Corporation
12 Commission, have hereunto set my hand and caused the
13 official seal of the Commission to be affixed at the
14 Capitol, in the City of Phoenix, this ____ day of
_____, 2002.

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BRIAN C. McNEIL
Executive Secretary

DISSENT

(JP)

23 This document is available in alternative formats by contacting Shelly M. Hood, Executive
24 Assistant to the Executive Secretary, voice phone number 602-542-3931, E-mail address:
25 shood@cc.state.az.us